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ATTORNEY FOR DEBTOR(S)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:

Joe Bob Scroggins

Debtor(s)

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**CASE NO. 22-41027-MXM
CHAPTER 13**

FREEDOMROAD FINANCIAL

Movant

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**Hearing date: June 9, 2022
Hearing time: 9:30 AM**

vs.

Joe Bob Scroggins

Debtor(s)

RESPONDENT/DEBTOR'S AFFIDAVIT

STATE OF TEXAS

COUNTY OF TARRANT

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KNOW ALL MEN BY THESE PRESENTS:

BEFORE ME, the undersigned authority, on this day personally appeared Joe Bob Scroggins, who after being by me duly sworn and upon oath stated that she is over eighteen (18) years of age, of sound mind, and is qualified and competent in all respects to make this affidavit and does so of her own personal knowledge, and he further stated that the following statements are true and correct and based upon her personal knowledge:

1. Debtor, Joe Bob Scroggins, filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code in Case Number 22-41027-MXM on or about May 3, 2022.
2. On or about May 13, 2022, FreedomRoad Financial, Movant (hereinafter "Movant") filed a Motion for Relief From Stay seeking a lift of the automatic stay insofar as the property described in the Motion for Relief From Stay.
3. Debtor is not in possession of the 2022 KTM 350 ECM.
4. The above-described property is not a burden to the Bankruptcy Estate and should not be abandoned. The debtor currently does not have a vehicle to commute back and forth to his place of employment. The bike is a dual sport motorcycle. Meaning dirt/street legal.
5. Debtor has in full force and effect an insurance policy on the above-described property.
6. Movant has indicated that Debtor was delinquent in pre and post petition payments at the time their attorney filed this Motion to Lift Stay. Movant also claims the debtor has deliberately abandoned the property, which was not the case.
7. Debtor would be caused irreparable injury and undue hardship if the Automatic Stay were lifted and Movant was granted leave to sell the property. It is necessary to her reorganization.
8. Debtor believes he has equity in the property and will further adequately protect Movant's interest.
9. Debtor is current on her Chapter 13 Trustee payments.

WHEREFORE, Debtor respectfully requests that this Court deny Movant's Motion to Lift Stay.

SIGNED this the 25 day of May, 2022.

/s/ [Signature]
DEBTOR

May 25, 2022 SUBSCRIBED AND SWORN TO before me by the above-named Affiant on to certify which witness my hand and seal of office.



/s/ [Signature]
Notary Public, State of Texas

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 25, 2022, a true and correct copy of the foregoing *Respondent/Debtor's Affidavit* was served on the following parties in interest by first class mail and/or ECF notification:

Respectfully Submitted,

LEE LAW FIRM, PLLC

/s/ Christopher M. Lee

Christopher M. Lee

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CHAPTER 13 TRUSTEE

Tim Truman

6851 NE Loop 820, Ste 300

N. Richland Hills, Texas 76180

U.S. TRUSTEE

United States Trustee

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DEBTOR

Joe Bob Scroggins

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OPPOSING COUNSEL

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